

FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

2022 JUL 13 PM 12:16

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

UNITED STATES OF AMERICA ) **INDICTMENT**

v.

Case Number: 3:22 CR 51 DRL

CAROLYN DAVIS

18 U.S.C. § 922(a)(6)

**THE GRAND JURY CHARGES:**

On or about September 1, 2020, in the Northern District of Indiana,

**CAROLYN DAVIS,**

defendant herein, in connection with the acquisition of a firearm from Kempf Gun Shop LLC, a licensed firearms dealer, knowingly made a false and fictitious statement to Kempf Gun Shop LLC that was intended and likely to deceive Kempf Gun Shop LLC as to a fact material to the lawfulness of the acquisition of the firearm by the defendant, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transactions Record to the effect that she was the actual transferee/buyer of the firearm when in fact she was not.

All in violation of Title 18, United States Code, Section 922(a)(6).

**FORFEITURE ALLEGATIONS**

1. The allegations contained in the Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(a)(6) as alleged in the Indictment, the defendant, **CAROLYN DAVIS**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any and all firearms, firearm magazines or clips, and ammunition involved in the commission of the offense.

Dated: July 13, 2022

A TRUE BILL:

s/ Foreperson  
Grand Jury Foreperson

APPROVED BY:

CLIFFORD D. JOHNSON  
UNITED STATES ATTORNEY

By: s/ Frank E. Schaffer  
Frank E. Schaffer  
Assistant United States Attorney